

FILED
COURT OF APPEALS
DIVISION II

2020 JUN 26 PM 12:14

IN THE COURT OF APPEALS OF THE STATE OF
WASHINGTON
DIVISION II BY _____
DEPUTY

State of Washington
Respondent,

v.

Scott Eugene Ridgley
Appellant.

Court of Appeals Cause No. 53732-0-11

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I Scott Ridgley, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief.

I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground I

See attachment

Additional Ground II

see attachment

If there are additional grounds, a brief summary is attached to this statement.

Date: _____

Signature: Scott Ridgley

Court of Appeals State of Washington

Division II

State of Washington
respondent

Vs

Scott Eugene Ridgley
Appellant

Statement of Additional Grounds

Additional Grand #1

Jurisdiction is an absolute element in any proceeding before the Court.

Affiant/APPellant finds no record or proof of Jurisdiction from the plaintiff or any States parties.

The law requires proof of Jurisdiction to appear on the record.. and.. all proceedings

Harans V Levine
415 US 533

The question of Jurisdiction in the Court either over the person, the subject matter or the place where the crime was committed can be raised at any stage of the criminal

proceeding; it is never presumed, but must always be proved, and is never waived by defendant

U.S. V. Rogers
23F 658

As in; State V. Knight 79 Wash. App 670

This appellant argue that Carl Nielsen did not have jurisdiction in Onalaska, Wa, because he was a Centralia City police officer, and not a member of the JNET task force - see Exhibits, A-E. Exhibit C Line 6 clearly states Nielsen is not a member of JNET.

As the records check shows, Sergeant Brian was the sergeant in charge of overseeing daily operations of JNET.

Commander of the JNET was Patrick Fitzgerald; he was the first line supervisor.

Additional Ground (2)

There were no (Written reports) filed to the Washington Courts. Fact, the written reports that are required by RCW 9.73.230 would seem to be late or not done at all.



City of Chehalis Police Department

Glenn R. Schaffer, Chief

350 N. Market Blvd. Rm 201 Chehalis, WA 98532
Ph 360-748-8605, Fax 360-748-1513

Exhibit A



January 7, 2019

Scott E. Ridgley, #32332
Cell C-2 V-22
28 SW Chehalis Avenue
Chehalis, WA 98532

Dear Mr. Ridgley,

I was able to contact the Centralia Police Department to get the information you requested.

Commander Patrick Fitzgerald was the assigned commander for JNET in April and May of 2017.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Hampson". The signature is fluid and cursive.

Julie Hampson
Records Technician

Exhibit B



Centralia Police Department
118 W. Maple Street / P.O. Box 609
Centralia, Washington 98531

Carl E. Nielsen, Chief of Police
Phone 360-330-7680
cpd@cityofcentralia.com

12/20/2018

Scott E. Ridgley, #32332
Cell C-2 V-22
28 SW Chehalis Avenue
Chehalis, WA 98532

RE: Request for information detailed as "Could you please tell me who the chief law enforcement or assigned commander for (JNET) was in an for the months of April and May of 2017? And or the designee above the rank of first line supervisor for (JNET) was on the above dates and time?"

Mr. Ridgley,

Centralia Police Department received your request detailed above in our office on Thursday, December 20, 2018. I was able to gather the information you are requesting from current command staff.

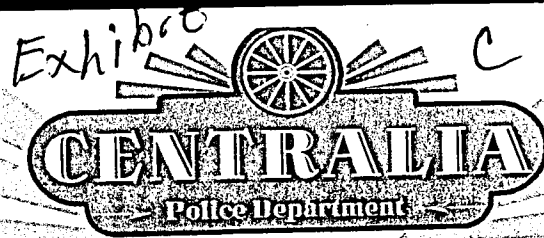
If I understand your request for information correctly, you want to know who was in charge of JNET above the rank of the sergeant (first line supervisor). In April and May of 2017 (now retired) Commander Patrick Fitzgerald was the assigned commander for JNET.

Please feel free to contact our office if you have any questions.

Respectfully,

Taresa Robertson

Taresa Robertson
Public Records Specialist



Centralia Police Department
118 W. Maple Street / P.O. Box 609
Centralia, Washington 98531

Carl E. Nielsen, Chief of Police
Phone 360-330-7680
cpd@cityofcentralia.com

5/28/2019

Scott-

The search has been conclude for your request. I will respond each numeration of your letter below.

1. In the year of 2017 how many wire intercepts, evidence intercepts, and/or wire taps - wire orders did JNET request in 2017? **(33 Wires requested/issued in 2017)**
2. How many wire orders did the police chief Carl Nielsen sign and/or grant in the year 2017? **(25 Wires were signed by Chief Nielsen 2017)**
3. How many of those order's were granted to JNET in the year 2017 by Carl Nielsen? **(25 wires were signed by Chief Nielsen 2017)**
4. How many wire orders, wire intercepts, evidence intercepts and/or wire taps did the commander of JNET in the year 2017 Stacy Denham approve or grant to JNET members for 2017 **(3 wires signed by Commander Denham/Deputy Chief Denham in 2017)**
5. All of the above questions 1-4 are for record request for any identifiable records to these questions. **(Responsive records/answers are included in responses 1-4)**
6. Are there any records stating that police chief Carl Nielsen is an active member of the JNET team for the months of April & May 2017. **(Chief Nielsen is not a member of JNET)**

A side note: 4 wires signed by Command Fitzgerald and 1 signed by Chehalis Chief Glenn Schaffer. This was not part of your request but counts as part of the 33 wires signed in 2017.

We have processed your request and are including the records we have located at this time and believe are responsive to your request. This is our final definitive response. This request is now closed.

Kind Regards,

D. Sims
Records Unit

Exhibit D



WASHINGTON
COURTS

ADMINISTRATIVE OFFICE OF THE COURTS

Callie T. Dietz
State Court Administrator

January 15, 2018

Scott E. Ridgley
No. 32332 C-2 U-22
28 SW Chehalis Avenue
Chehalis WA 98532

RECEIVED
APR 24 2020
Nielsen, [redacted] Koch, P.L.L.C.

Dear Mr. Ridgley,

This letter is in response to your request for copies of monthly interception reports submitted for the Joint Narcotic Enforcement Team (JNET) in Centralia, Washington, for the months of April and May of 2017.

A thorough review of the log and intercept reports for 2017 was carried out. No reports submitted by JNET were located during that search.

In providing this information, we have completed our response. Your request file will be closed.

Thank you.


Public Records Office
Administrative Office of the Courts

STATE OF WASHINGTON

1206 Quince Street SE • P.O. Box 41170 • Olympia, WA 98504-1170
360-753-3365 • 360-956-5700 Fax • www.courts.wa.gov



Centralia Police Department
118 W. Maple Street / P.O. Box 609
Centralia, Washington 98531

Carl E. Nielsen, Chief of Police
Phone 360-330-7680
cpd@cityofcentralia.com

1/2/2019

[REDACTED]
Lewis County Jail
28 SW Chehalis Ave.
Chehalis, WA 98532

RE: Request for information detailed as "Public Records from April 2017 to May 2017. I am requesting the following information

1. Who is the commander or the head of JNET?
2. When was that person placed as commander or head of JNET?
3. Who is the next commanding or head of JNET
4. Can you give me a list of all personal (sic) in the chain of command of all three sections of JNET
5. I am requesting a copy of the inter agency agreement

I am requesting the above under RCW 41.12.190 for I am indigent. Submitted this 22nd day of December 2018."

Mr. Emery,

Centralia Police Department received your request for information detailed above in our office on Monday, December 24, 2018. I was able to gather some of the information you are requesting from current command staff.

1. During the time frame of April 2017 to May 2017, Commander Stacy Denham was the assigned commander for JNET.
2. Commander Denham was placed in charge of JNET January 5, 2016.
3. During the time frame of April 2017 to May 2017, (now retired) Sergeant Brian Warren was the sergeant in charge of overseeing daily operations of JNET.
4. I do not understand your question for this enumeration as there are not three sections of JNET. Please clarify this portion of your request for information.
5. The inter agency agreement is attached.

If the clarification requested for enumeration four has not been received by February 1, 2019, this request will be closed with no further action.

Kind Regards,

Taresa Robertson
Records Unit